

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MOUNTAIN EXPRESS OIL COMPANY, et al.,

Debtors.¹

Chapter 11

Case No. 23-90147 (DRJ)

(Jointly Administered)

**DEBTORS' WITNESS AND EXHIBIT LIST FOR HEARING SCHEDULED FOR
MARCH 22, 2023 AT 3:30 P.M. (PREVAILING CENTRAL TIME)**

The above-captioned debtors and debtors in possession (collectively, the “Debtors”) hereby submit the following *Witness and Exhibit List* (the “Witness and Exhibit List”) with respect to the hearing scheduled to be held on March 22, 2023 at 3:30 p.m. (prevailing Central Time) (the “Hearing”) in the above-captioned bankruptcy cases (the “Cases”), pending before the Honorable David R. Jones, United States Bankruptcy Judge, Courtroom 400, 515 Rusk, Houston, Texas 77002 as follows:

WITNESS LIST

The Debtors may call the following witnesses:

1. Michael Healy, Chief Restructuring Officer.
2. Geoffrey Richards, Raymond James & Associates (proposed Investment Banker).
3. Any witness listed, offered, or called by any other party.
4. Any witness required for rebuttal or impeachment.
5. The Debtors reserve the right to cross-examine any witness called by any other party.

¹ A complete list of each of the Debtors in these Chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at www.kccllc.net/mountainexpressoil. The location of Debtor Mountain Express Oil Company's principal place of business and the Debtors' service address in these Chapter 11 cases is 3650 Mansell Road, Suite 250, Alpharetta, GA 30022.

EXHIBIT LIST

| Exhibit No. | Description | Mark | Offer | Object | Admit | W/D | Disposition After Hearing |
|--------------------|--|-------------|--------------|---------------|--------------|------------|----------------------------------|
| 1. | Declaration of Michael Healy in Support of Debtors' Chapter 11 Petitions and First Day Relief [Docket No. 57] | | | | | | |
| 2. | Any exhibits listed, designated, or offered by any other party. | | | | | | |
| 3. | Any exhibits necessary for rebuttal. | | | | | | |
| 4. | Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases and related adversary proceedings. | | | | | | |

RESERVATION OF RIGHTS

The Debtors reserve the right to modify, amend or supplement this Witness and Exhibit List at any time. The Debtors reserve the right to ask the Court to take judicial notice of pleadings, orders, transcripts and/or documents filed in or in connection with these Cases, to offer rebuttal exhibits, and to supplement or amend this Witness and Exhibit List at any time prior to the Hearing. Designation of any exhibit above does not waive any objections the Debtors may have to any exhibit listed on any other party's exhibit list.

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Dated: March 21, 2023

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/s/ Michael D. Warner

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Proposed Counsel to the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of March, 2023, a true and correct copy of the above and foregoing has been served on all parties that are registered to receive electronic transmission through this Court's CM/ECF filing system in these cases.

/s/ Michael D. Warner

Michael D. Warner